

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Protection and Advocacy for People with Disabilities, Inc.,	)	Civil Action No. 2:20-cv-02738-DCN
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<b><u>JOINT STATUS REPORT</u></b>
	)	
James Alton Cannon, Jr., in his official	)	
capacity as Charleston County Sheriff,	)	
Mitch Lucas, in his official capacity as	)	
Assistant Charleston County Sheriff, Willis	)	
Beatty, in his official capacity as Chief	)	
Deputy of Charleston County Sheriff's	)	
Office, and Charleston County School	)	
District,	)	
	)	
Defendants.	)	
	)	

---

The parties and their representatives met with Magistrate Judge Mary Gordon Baker on May 3, 2021 to begin a process of mediation in the above-referenced matter. The parties submitted an initial status report on May 14, 2021, and updated status reports on June 4, 2021, July 16, 2021, September 15, 2021, January 31, 2022, May 11, 2022, and August 9, 2022.

The parties agreed to have an assessment to be conducted under the direction and supervision of the Center for Children's Law and Policy (CCLP) and to be paid for by Charleston County. The CCLP team received all requested documents from the Sheriff's Office in a timely manner and the Sheriff's Office staff coordinated the visit to the facility. The CCLP team visited the facility, reviewed records, toured the current and future facility and conducted interviews on November 2-3, 2021. Dr. Monique Khumalo made second site visit to hold further meetings with mental health and review additional records on January 18-19, 2022. Some of the CCLP team will visit again for one day on November 9, 2022. Based on supply chain issues and delays in

construction, the facility opened to staff on May 25, 2022 and began accepting youth over the summer.

The CCLP team provided a report to the defendants, who have reviewed it and responded to areas where they believe there was either a misunderstanding or a miscommunication regarding a topic, so that such can be addressed by CCLP. The medical assessment has not been completed due to the medical expert not being available in November, 2021. The return visit is being discussed between CCLP staff and the defendants now, in order to make that visit as productive as possible and information has been requested. The defendants are in the process of providing the requested information to CCLP.

The return visit will take place on November 9, 2022, as that was the best date for the CCLP staff. The original reports of CCPL have been provided to counsel for plaintiffs based on a status conference held with the court on May 18, 2022. If a supplemental report is received, it will be produced to all parties.

The parties remain grateful for the court's supervision and agree to submit an updated Joint Status Report after receiving CCPL's supplemental report or in January, 2023 (whichever is sooner) and to reach out to the court if there are any other issues.

*Signature Pages Follow*

**NELSON MULLINS RILEY & SCARBOROUGH LLP**

By: s/ROBERT BRUNSON

Robert H. Brunson  
Federal Bar No. 4971  
E-Mail: [robert.brunson@nelsonmullins.com](mailto:robert.brunson@nelsonmullins.com)  
151 Meeting Street / Sixth Floor  
Post Office Box 1806 (29402-1806)  
Charleston, SC 29401-2239  
(843) 853-5200

**BURNETTE SHUTT MCDANIEL**

Stuart Andrews  
Federal Bar No. 1099  
E-Mail: [sandrews@burnetteshutt.law](mailto:sandrews@burnetteshutt.law)  
912 Lady Street / 2<sup>nd</sup> Floor  
PO Box 1929  
Columbia, SC 29202  
(803) 850-0912

-and-

**THE STEINBERG LAW FIRM, LLP**

Annie Elizabeth Andrews  
Federal Bar No. 13134  
E-Mail: [AAndrews@steinberglawfirm.com](mailto:AAndrews@steinberglawfirm.com)  
118 Goose Creek Blvd, South  
P.O. Box 1028  
Goose Creek, SC 29445  
(843) 572-0700

*Attorneys for Plaintiff*

Charleston, South Carolina  
October 10, 2022

**SENN LEGAL, LLC**

s/ ROBIN L. JACKSON

Robin L. Jackson (Fed. I.D. No. 07465)

Sandra J. Senn (Fed. I.D. No. 05761)

3 Wesley Drive

PO Box 12279

Charleston, SC 29422

Phone: 843-556-4045 / Fax: 843-556-4046

robin@sennlegal.com

sandy@sennlegal.com

*Attorneys for Charleston County Sheriff Defendants*

Charleston, South Carolina

October 10, 2022

**HALLIGAN MAHONEY WILLIAMS SMITH  
FAWLEY & REAGLE, PA**

s/ JOHN M. REAGLE

John M. Reagle (Fed. I.D. No. 7723)

Dwayne T. Mazyck (Fed. I.D. No. 9026)

PO Box 11367

1301 Gervais Street, Suite 1400

Columbia, SC 29211-1367

Phone: 803-254-4035 / Fax: 803-771-4422

jreagle@hmwlegal.com

dmazyck@hmwlegal.com

*Attorneys for Charleston County School District*

Columbia, South Carolina

October 10, 2022